# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CVP AND INC	)
CYRANO, INC.,	)
Plaintiff,	) )
v.	) CIVIL ACTION NO. 05-CV-11558-DPW
QUOTIUM TECHNOLOGIES, INC.,	)
QUOTIUM TECHNOLOGIES, S.A., and	)
TECHNOLOGIES, S.A.,	)
Defendants.	) ) )

## **JOINT MOTION TO STAY**

The parties to the above-captioned action hereby jointly move this Court to stay the above-captioned action.

As grounds for this Motion, the parties state that they have recently engaged in renewed settlement discussions and that, as a result of those discussions, they have agreed to a standstill of all litigation globally, pending the finalization of a written settlement agreement. The parties further state that many material terms of a settlement in this complex matter have been agreed upon and that they are working diligently to finalize the remaining terms, all of which would then be reduced to a writing and executed. The parties respectfully submit that, in view of the high likelihood that they can soon reach agreement on all material settlement terms, a stay of this action will serve the interests of justice and judicial economy.

WHEREFORE, the parties respectfully request that the Court enter an immediate stay of this matter, following which the parties shall, within 21 days of the Court's Order entering this

stay, advise the Court as to their progress and intentions regarding the furtherance of the stay.

Respectfully submitted,

Plaintiff, CYRANO, INC., By its attorneys,

### /s/ Michael K. Sugrue\_

Stephen Y. Chow, BBO #082990 Michael K. Sugrue, BBO #655878 **BURNS & LEVINSON LLP** 125 Summer Street Boston, MA 02110 617-345-3000

Dated: February 15, 2007

Defendants,

QUOTIUM TECHNOLOGIES, INC., QUOTIUM TECHNOLOGIES, S.A., and TECHNOLOGIES, S.A.

By their attorneys,

## /s/ Kevin J. O'Connor\_

Kevin J. O'Connor, BBO #555250 Mayeti Gametchu, BBO #647787 PARAGON LAW GROUP, LLP 184 High Street Boston, MA 02110 (617) 399-7950

Dated: February 15, 2007

#### **Certificate of Service**

I hereby certify that on February 15, 2007, this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Stephen Y. Chow